

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Claude M. Stern (Bar No. 96737)

2 claudestern@quinnemanuel.com

Cole Malmberg (Bar No. 305250)

3 colemalmberg@quinnemanuel.com

555 Twin Dolphin Drive, 5th Floor

4 Redwood Shores, California 94065

Telephone: (650) 801-5002

5 Facsimile: (650) 801-5100

6 Tigran Guledjian (Bar No. 207613)

tigranguledjian@quinnemanuel.com

7 Valerie Roddy (Bar No. 235163)

valerieroddy@quinnemanuel.com

8 Scott A. Florance (Bar No. 227512)

scottflorance@quinnemanuel.com

9 Jordan B. Kaericher (Bar No. 265953)

jordankaericher@quinnemanuel.com

10 865 S Figueroa Street, 10th Floor

Los Angeles, California 90017

11 Telephone: (213) 443-3000

Facsimile: (213) 443-3100

12 *Attorneys for Defendants Alphonso Inc., Ashish*  
13 *Chordia, Lampros Kalampoukas, and Raghu*  
14 *Kodige*

15 **UNITED STATES DISTRICT COURT**  
16 **NORTHERN DISTRICT OF CALIFORNIA**  
17 **SAN FRANCISCO DIVISION**

18 FREE STREAM MEDIA CORP. d/b/a  
SAMBA TV,

19 Plaintiff,

20 v.

21 ALPHONSO INC., et al.

22 Defendants.

Case No. 3:17-cv-02107-RS

**STIPULATION AND ~~PROPOSED~~**  
**ORDER CONTINUING EXPERT**  
**DISCLOSURE AND DISCOVERY**  
**DEADLINES BY ONE WEEK**

23  
24 **STIPULATION**

25 WHEREAS, Plaintiff Free Stream Media Corp. d/b/a Samba TV (“Samba”) has sued  
26 defendants Alphonso Inc., Ashish Chordia, Lampros Kalampoukas, and Raghu Kodige  
27 (collectively, “Alphonso”) for patent infringement in the above-captioned action;

1 WHEREAS, Alphonso intends to file a motion for broader relief from the Court's  
2 scheduling order as a result of Samba's September 15, 2017 motion for leave to amend its  
3 infringement contentions and other case developments, which Samba anticipates it will oppose;

4 WHEREAS, pursuant to the Court's June 6, 2017 Case Management Order (ECF No. 148),  
5 the deadline for serving opening expert reports is September 22, 2017;

6 WHEREAS, the parties agree that all parties would benefit from an additional week to  
7 complete opening expert reports, while the parties prepare and oppose the above-mentioned  
8 motions, and address discovery recently provided in the case, although by filing this stipulation  
9 neither party is waiving any rights to oppose any action taken by the other party, nor by filing or  
10 agreeing to this stipulation is any party agreeing or conceding that one week is sufficient time to  
11 review and process this discovery;

12 WHEREAS, extending all expert disclosure and discovery deadlines by one additional  
13 week will not require any other dates in the Case Management Order to move;

14 WHEREAS, the parties agree that (1) this one-week extension is being requested without  
15 prejudice to any further relief any party may seek or any argument any party might make; and  
16 (2) they will not cite the fact of this one-week extension as evidence that any party has or has not  
17 been prejudiced, as an admission by any party, or that any party has acquiesced in any action by  
18 any other party; and

19 WHEREAS, the parties agree that the existence of this stipulation and order will be cited  
20 only for the fact of the revised disclosure and discovery deadlines;

21 The parties hereby agree and move the Court as follows:

22 1. On or before September 29, 2017, the parties will designate experts in accordance  
23 with Federal Rule of Civil Procedure 26(a)(2).

24 2. On or before October 27, 2017, the parties will designate their supplemental and  
25 rebuttal experts in accordance with Federal Rule of Civil Procedure 26(a)(2).

26 3. On or before November 10, 2017, all discovery of expert witnesses pursuant to  
27 Federal Rule of Civil Procedure 26(b)(4) shall be completed.

28

1           4.       No other dates in the June 6, 2017 Case Management Order (ECF No. 148) are  
2 changed as a result of this stipulation and order.

3           5.       The extension of these dates is made without prejudice to any other motion or  
4 argument the parties may advance and the existence of this stipulation and order will be cited only  
5 for the fact of the revised disclosure and discovery deadlines.

6           Respectfully submitted,

7 DATED: September 20, 2017

TENSEGRITY LAW GROUP, LLP

8  
9 By /s/ William P. Nelson

Matthew D. Powers (Bar No. 104795)

William P. Nelson (Bar No. 196091)

Jennifer K. Robinson (Bar No. 270954)

Samantha A. Jameson (Bar. No. 296411)

Natasha M. Saputo (Bar No. 291151)

TENSEGRITY LAW GROUP, LLP

555 Twin Dolphin Drive, Suite 650

Redwood Shores, CA 94065

Telephone: (650) 802-6000

Facsimile: (650) 802-6001

Email:

matthew.powers@tensegritylawgroup.com

william.nelson@tensegritylawgroup.com

jen.robinson@tensegritylawgroup.com

samantha.jameson@tensegritylawgroup.com

natasha.saputo@tensegritylawgroup.com

samba\_service@tensegritylawgroup.com

18 *Attorneys for Plaintiff,*

19 *Free Stream Media Corp. d/b/a Samba TV*

20 DATED: September 20, 2017

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

22 By /s/ Claude M. Stern

23 Claude M. Stern

24 *Attorneys for Defendants Alphonso Inc., Ashish*

*Chordia, Lampros Kalampoukas, and Raghu*

*Kodige*

1 **~~PROPOSED~~ ORDER**

2 It is so ordered.

3 1. On or before September 29, 2017, the parties will designate experts in accordance  
4 with Federal Rule of Civil Procedure 26(a)(2).

5 2. On or before October 27, 2017, the parties will designate their supplemental and  
6 rebuttal experts in accordance with Federal Rule of Civil Procedure 26(a)(2).

7 3. On or before November 10, 2017, all discovery of expert witnesses pursuant to  
8 Federal Rule of Civil Procedure 26(b)(4) shall be completed.

9 4. No other dates in the June 6, 2017 Case Management Order (ECF No. 148) are  
10 changed as a result of this stipulation and order.

11 5. The extension of these dates is made without prejudice to any other motion or  
12 argument the parties may advance and the existence of this stipulation and order will be cited only  
13 for the fact of the revised disclosure and discovery deadlines.

14 DATED: September 28, 2017

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16 The Honorable Richard Seeborg  
17 UNITED STATES DISTRICT COURT JUDGE  
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